

**STATE OF SOUTH CAROLINA**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**Docket No. 2019-195-E**

In re: )  
South Carolina Energy Freedom )  
Act (H.3659) Proceeding Related )  
to Duke Energy )  
Carolinas, LLC for the )  
Commission to Establish Reasonable )  
Guidelines to Ensure Reasonable )  
Interconnection Timelines, Including )  
Time Requirements to Deliver a )  
System Impact Study to All )  
Interconnection Customers that )  
Execute a System Impact Study )  
Agreement – S.C. Code Ann. )  
Section 58-27-460(D) )

**PETITION TO INTERVENE  
OF JOHNSON DEVELOPMENT  
ASSOCIATES, INC.**

**Petition to Intervene of Johnson Development Associates, Inc.**

Johnson Development Associates, Inc. (“JDA”), in accordance with SC Code Regs. 103-825, submits this petition to intervene in the subject docketed proceeding. In support of this petition, JDA provides the following:

1. On June 4, 2019, the Public Service Commission of South Carolina (“Commission”) opened Docket 2019-195-E in accordance with South Carolina’s Energy Freedom Act (“The Act”) and as applicable to Duke Energy Carolinas, LLC. (“DEC”).
2. The Commission has not yet established a procedural schedule for this application. As such, JDA’s petition is timely filed.
3. JDA is a South Carolina Corporation, founded in 1986 and headquartered at 100 Dunbar Street, Spartanburg, South Carolina, 29306. JDA is a multi-division developer of industrial, multi-family, self-storage, renewable energy, and commercial projects.

4. JDA has a direct and substantial interest in the outcome of this proceeding, and will be directly affected by the discussion and resolution of the topics covered therein. JDA's position and market presence relates directly to the details of this proceeding concerning DEC. JDA has qualifying facilities under development or positioned in DEC's interconnection queue that will be impacted by the decisions this Commission makes regarding the establishment of reasonable guidelines related to interconnection and other decisions made pursuant to SC Code Section 58-27-460 and other conditions this Commission finds necessary to implement the provisions of H. 3659. JDA has a substantial and specific economic interest in the implementation of H. 3659 as it relates to interconnection as JDA currently develops renewable energy projects in South Carolina. JDA's interest in this proceeding cannot be adequately represented or protected by any other party.
5. Pursuant to SC Code Regs. 103-804(T), JDA is represented by the following counsel in this proceeding:

James H. Goldin  
 SC Bar No. 100092  
 E-Mail: [jamey.goldin@nelsonmullins.com](mailto:jamey.goldin@nelsonmullins.com)  
 Weston Adams, III  
 Nelson Mullins Riley & Scarborough LLP  
 SC Bar No. 64291  
 E-Mail: [weston.adams@nelsonmullins.com](mailto:weston.adams@nelsonmullins.com)  
 1320 Main Street, 17<sup>th</sup> Floor  
 Columbia, SC 29201  
 (803) 799-2000

WHEREFORE, Petitioners pray that they be allowed to intervene as a party of record and participate fully in this proceeding.

[Signature page to follow]

Respectfully submitted this 27th day of June, 2019.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: s/James H. Goldin

James H. Goldin

SC Bar No. 100092

E-Mail: jamey.goldin@nelsonmullins.com

Weston Adams, III

SC Bar No. 64291

E-Mail: weston.adams@nelsonmullins.com

1320 Main Street / 17th Floor

Post Office Box 11070 (29211-1070)

Columbia, SC 29201

(803) 799-2000